

In Re: Union Electric Company's )  
2008 Utility Resource Filing pursu- ) EO-2007-0409  
ant to 4 CSR 240 - Chapter 22. )

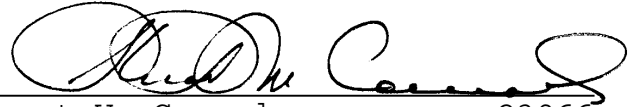
suggest that construction will not go forward unless Missouri law is changed to permit CWIP/;

- the uncertainty analysis appears to be flawed and deficient resulting from the differing positions regarding CWIP; and
- the absence of a life extension study concerning the Meramec plant, as well as its essentially concurrent retirement with the suggested operational date of any additional nuclear generation raise questions about the level of due diligence that has been applied to those aspects of the IRP.

4. Nor should Noranda's silence be presumed to prejudice the positions of other parties. We would expect to address these matters if requested by the Commission at the October 7, 2008 on-the-record conference.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



Stuart W. Conrad 23966  
3100 Broadway, Suite 1209  
Kansas City, Missouri 64111  
(816) 753-1122  
Facsimile (816) 756-0373  
Internet: stucon@fcplaw.com

ATTORNEY FOR NORANDA ALUMINUM, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by electronic means or by U.S. mail, postage prepaid, addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein.

  
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Stuart W. Conrad

Dated: October 6, 2008